

EXHIBIT D

INDEX IN SUPPORT OF MOTION TO SEAL PORTIONS OF SAVEONSP'S MOTION TO COMPEL JJHCS TO PRODUCE
DOCUMENTS SHOWING ENFORCEMENT OF THE MAY-NOT-USE PROVISION (ECF NOS. 383, 391, 399, & 415)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson regarding SaveOnSP's Motion to Compel JJHCS to Produce Documents Showing Enforcement of the May-Not-Use Provision, dated September 16, 2024 (ECF No. 383)</u>		JJHCS requests the redaction of information in and exhibits to the September 16 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information. Exhibit 27 is a document produced by TrialCard, which also contains information confidential to JJHCS.	If filed on the public docket, these portions of the September 16 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Pages 3–7; Notes 3, 6 & 7	Redactions discussing confidential exhibits					
Exhibits 2, 24, 25 & 27	Sealing of emails and attachments reflecting confidential business information					

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Exhibits 3, 6, 12, 14 & 16	Redactions to discovery letters discussing confidential documents		disadvantage if its competitors secured the information.			
Exhibits 5, 7, 8, 9, 10, & 11	Sealing of confidential JJHCS policy documents					
Exhibits 18, 19, 20, 21, 22, 23, 29 & 30	Sealing of confidential JJHCS report, guidelines, and checklists					

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<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson in opposition to SaveOnSP's motion to compel, dated September 26, 2024 (ECF No. 391)</u>	JJHCS requests the redaction of information in and exhibits to the September 26 letter	If filed on the public docket, these portions of the September 26 letter and the exhibits	JJHCS requests the sealing of only the information that will reveal	None	None

<p>Pages 5 (“illustrating . . . patients”), (“ . . . identified”), (“ . . . programs”), (“ . . . data”); 6 (“Obtain . . . information”), (“Document . . . system”), (“which . . .”), (“listing . . .”); 7 (“a . . . 2021”), (“That . . . Program.”), (“And . . . program.”), (“under . . . claim.”), (“same . . . phone”), (“Once . . . not”); 8 (“changing . . . Id.”), (“changes . . . channels”), (“ . . . Requirements), (“ . . . Requirements”), (“ . . . Flow”), (“both . . .”),</p>	<p>Redactions discussing confidential exhibits</p>	<p>that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information. In addition, JJHCS seeks to seal two spreadsheets produced by TrialCard containing confidential health information.</p>	<p>thereto would reveal confidential material relating to JJHCS’s sensitive business information.</p> <p>Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information. Disclosure of Exhibits 24 and 25 would also reveal patients’ private health information.</p>	<p>confidential information that is not known to the general public. No less restrictive alternative is available or practicable.</p>		
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<p>(“on . . . 2023”), (“For . . .”), (“summarize . . . benefits”), (“listing . . .”) (“listing . . . “); 9 (“through . . . basis”) (“listing . . .”), (“listing . . . SaveonSP”), (“The . . . efforts”), (“mailing . . . Letter”), (“Saveon . . .own.”)</p> <p>Note 9</p>					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
Exhibits 11, 12, 16, 17, 18, 19, 20, 21, 22, 23 & 28	Sealing of presentation, spreadsheets, procedures, and other documents reflecting confidential business information					
Exhibits 24 and 25	Sealing of spreadsheets produced by TrialCard containing confidential patient health information					

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Exhibit 26	Redactions to discovery letter discussing confidential documents					
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson in reply to JJHCS's opposition to SaveOnSP's motion to compel, dated October 3, 2024 (ECF Nos. 399, 415)</u>		JJHCS requests the redaction of information in and exhibits to the October 3 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these	If filed on the public docket, these portions of the October 3 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive	None	None
Pages 3 & 4; Notes 2, 3 & 5	Redactions discussing confidential exhibits					

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Attachment to Exhibit 31	Redaction of confidential spreadsheet containing confidential health information provided by TrialCard	documents and exhibits contain sensitive business information as well as confidential patient health information.	business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information. Disclosure of the	alternative is available or practicable.		
Exhibits 32, 33, 34, 35, 36, 37, 38, 39 & 41	Sealing of emails and attachments reflecting confidential business information					

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Exhibit 40	Sealing of document reflecting confidential business presentation provided by TrialCard		Attachment to Exhibit 31 would also reveal patients' private health information.			